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6 *Special Insurance Counsel to*
7 *The Official Committee of Unsecured Creditors*

8 **UNITED STATES BANKRUPTCY COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**
SAN FRANCISCO DIVISION

10 In re

11 THE ROMAN CATHOLIC ARCHBISHOP
12 OF SAN FRANCISCO,

13 Debtor and Debtor in Possession.

Case No. 23-30564

Chapter 11

MONTHLY PROFESSIONAL FEE
STATEMENT FOR BURNS BAIR LLP
FOR MARCH 2024

14
15 **TO ALL INTERESTED PARTIES AND TO THEIR COUNSEL OF RECORD:**

16 **NOTICE IS HEREBY GIVEN** that Burns Bair LLP, special insurance counsel to the
17 Official Committee of Unsecured Creditors (the “Committee”), hereby files its monthly professional
18 fee statement for the period March 1, 2024 through March 31, 2024 (the “Fee Period”), pursuant to
19 the *Order Establishing Procedures and Authorizing Payment of Professional Fees and Expenses on*
20 *a Monthly Basis* (the “Compensation Order”), entered on October 16, 2023 [ECF No. 212]. The
21 total fees and expenses incurred by Burns Bair LLP on behalf of the Committee for the Fee Period
22 are as follows:

23

Period	Fees	Expenses	Total
March 1, 2024 – March 31, 2024	\$41,418.00 ¹	\$0.92	\$41,418.92
Net Total Allowed Payments this Statement Period (80% of fees and 100% of expenses)	\$33,134.40	\$0.92	\$33,135.32

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27 ¹ Burns Bair will contribute ten percent of all fees it receives in this case on a final basis to a settlement trust that is
28 approved as part of a plan of reorganization. As such fees are paid, Burns Bair will hold those funds in a trust account
until a settlement trust is established through a plan of reorganization.

1 Attached hereto at **Exhibit 1** is Burns Bair's itemized billing statement for its fees and
2 expenses billed during the Fee Period. Pursuant to the Compensation Order, the Net Total Allowed
3 Payments detailed in the chart above shall be paid from funds held by the estate of the Debtor, The
4 Roman Catholic Archbishop of San Francisco, unless an objection is filed with the Clerk of the
5 Court and served upon Burns Bair LLP within *14 days after the date of service* of this monthly
6 professional fee statement.

7 Dated: April 19, 2024

BURNS BAIR LLP

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9 By: /s/ Jesse J. Bair
Jesse J. Bair

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11 *Special Insurance Counsel to the Official*
12 *Committee of Unsecured Creditors*
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EXHIBIT 1

Burns | Bair

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Madison, Wisconsin 53703-3392
608-286-2302
www.BurnsBair.com

**Official Committee of Unsecured Creditors of
Archbishop of San Francisco**

Issue Date : 4/11/2024

Bill # : 01405

Matter: Insurance

PROFESSIONAL SERVICES RENDERED

Committee Meetings

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
3/2/2024	Jesse Bair	Review agenda for upcoming state court counsel meeting (.1);	0.10	\$90.00
3/2/2024	Timothy Burns	Review agenda for upcoming state court counsel meeting and correspond with J. Bair re same (.1);	0.10	\$112.00
3/5/2024	Jesse Bair	Participate in state court counsel meeting for insurance purposes re case developments and next-steps (.4);	0.40	\$360.00
3/21/2024	Timothy Burns	Prepare for state court counsel meeting by reviewing coverage information and case status summaries (.7);	0.70	\$784.00
3/21/2024	Timothy Burns	Participate in state court counsel meeting for insurance purposes re case developments and next-steps (.6);	0.60	\$672.00
3/21/2024	Timothy Burns	Participate in post-meeting call with J. Stang re outcome of state court counsel meeting, case strategy, and ongoing projects (.4); participate in call with J. Bair re same (.1);	0.50	\$560.00
3/29/2024	Timothy Burns	Review agenda for upcoming state court counsel meeting (.1); review attachment to same re potential Committee strategy in the bankruptcy case (.1);	0.20	\$224.00
3/31/2024	Jesse Bair	Review agenda for upcoming state court counsel meeting (.1);	0.10	\$90.00
Totals for Committee Meetings			2.70	\$2,892.00

Fee Applications

Date	Timekeeper	Narrative	Hours	Amount
3/1/2024	Jesse Bair	Review and respond to correspondence with G. Brown and B. Horn re the fee examiner's request for LEDEs information (.1);	0.10	\$90.00
3/12/2024	Jesse Bair	Review and respond to correspondence re US Trustee's request for information in connection with interim fee applications (.1);	0.10	\$90.00
3/13/2024	Jesse Bair	Correspondence with B. Horn re Burns Bair's first interim fee application (.1);	0.10	\$90.00
3/13/2024	Jesse Bair	Analysis of Burn Bair invoice for privilege and confidential information (.4);	0.40	\$360.00
3/13/2024	Jesse Bair	Correspond with the Committee re Burns Bair's monthly fee submission (.1);	0.10	\$90.00
3/18/2024	Jesse Bair	Correspond with the Committee and B. Horn re Burns Bair's monthly fee submission (.1);	0.10	\$90.00
3/19/2024	Brenda Horn-Edwards	Draft monthly professional fee statement (.1); prepare certificate of service (.2); correspond with J. Bair re same (.1);	0.40	\$136.00
3/19/2024	Jesse Bair	Review and edit Burns Bair monthly fee submission (.1);	0.10	\$90.00
3/20/2024	Brenda Horn-Edwards	File monthly professional fee statement in CM/ECF (.1); Email monthly professional fee application to service list and J. Bair (.1);	0.20	\$68.00
3/28/2024	Jesse Bair	Brief review re the fee examiner's preliminary report (.2);	0.20	\$180.00
3/28/2024	Jesse Bair	Correspondence with K. Dempski re hearing re the first interim fee applications (.1);	0.10	\$90.00
3/29/2024	Jesse Bair	Correspondence with fee examiner re call to discuss preliminary report (.1);	0.10	\$90.00
Totals for Fee Applications			2.00	\$1,464.00

Insurance Recovery Activities

Date	Timekeeper	Narrative	Hours	Amount
3/1/2024	Timothy Burns	Review correspondence with PSZJ and J. Bair re discovery from insurers and draft requests (.2);	0.20	\$224.00
3/1/2024	Timothy Burns	Review correspondence with J. Stang re potential 2004 discovery on insurers (.1);	0.10	\$112.00

3/1/2024	Jesse Bair	Review further revised versions of the Committee's discovery requests to the insurers (.1); analysis re additional potential edits to same and timing of serving requests (.1); review and respond to correspondence with J. Stang re same and overall insurance discovery strategy (.2);	0.40	\$360.00
3/1/2024	Jesse Bair	Correspondence with BB team re analysis needed re California Insurance Code Section 1610 as applied to non-admitted insurers (.1);	0.10	\$90.00
3/2/2024	Jesse Bair	Correspondence with the Debtor re call to discuss case insurance issues (.1);	0.10	\$90.00
3/2/2024	Jesse Bair	Correspondence with PSZJ re insurer discovery requests and Debtor insurance meeting (.1);	0.10	\$90.00
3/2/2024	Jesse Bair	Review California case law re non-admitted insurers and bond-posting requirements under Cal. Insurance Section 1616 and brief review re California admitted insurers list (.1);	0.10	\$90.00
3/2/2024	Timothy Burns	Review correspondence from Debtor re insurance strategy (.1); correspond with J. Bair re same (.1);	0.20	\$224.00
3/2/2024	Timothy Burns	Review J. Bair correspondence re bonding requirements for non-admitted insurers (.1);	0.10	\$112.00
3/2/2024	Timothy Burns	Review correspondence with PSZJ and J. Bair re discovery requests of insurers (.2);	0.20	\$224.00
3/4/2024	Karin Jonch-Clausen	Participate in conference with B. Cawley re California admitted and non-admitted insurers (.2);	0.20	\$110.00
3/4/2024	Karin Jonch-Clausen	Draft email memo summarizing non-admitted insurer information and case law re bonding-posting requirements for LMI and others (1.6);	1.60	\$880.00
3/4/2024	Brian Cawley	Participate in conference with K. Jonch-Clausen re California admitted and non-admitted insurers (.2);	0.20	\$110.00
3/4/2024	Timothy Burns	Participate in call with Debtor's counsel re case insurance issues (.5);	0.50	\$560.00
3/4/2024	Timothy Burns	Provide instructions to B. Cawley re assignment re Plan in TH bankruptcy case as it relates to ADSF matter (.2);	0.20	\$224.00
3/4/2024	Timothy Burns	Draft email memo to PSZJ re outcome of discussion with Debtor re potential insurance strategies (.3); participate in conference with J. Bair re same (.1);	0.40	\$448.00
3/4/2024	Jesse Bair	Participate in conference with T. Burns re outcome of case insurance call with the Debtor (.1);	0.10	\$90.00

3/4/2024	Jesse Bair	Provide supplemental instructions to K. Jonch-Clausen re research needed re California Insurance Section 1616 (.1);	0.10	\$90.00
3/5/2024	Timothy Burns	Review B. Cawley email memo re coverage limits for potential test cases (.2);	0.20	\$224.00
3/5/2024	Timothy Burns	Review correspondence from B. Michael re case insurance strategy (.1); draft response to same (.2);	0.30	\$336.00
3/5/2024	Timothy Burns	Review K. Jonch-Clausen's email memo re admitted status of insurers and implications re same (.2);	0.20	\$224.00
3/5/2024	Jesse Bair	Review T. Burns email memo re outcome of insurance call with the Debtor (.1); review related correspondence with B. Michael and T. Burns re same and next-steps re case insurance strategy (.1);	0.20	\$180.00
3/6/2024	Jesse Bair	Provide instructions to B. Cawley re duty to settle and insurance demand letter issues (.2);	0.20	\$180.00
3/6/2024	Jesse Bair	Correspond with B. Michael re the Committee's draft insurance discovery requests (.1);	0.10	\$90.00
3/6/2024	Brian Cawley	Begin detailed review of case law re impact of lack of consent to settle provision on policyholder's ability to settle claims (3.4);	3.40	\$1,870.00
3/6/2024	Brian Cawley	Begin summarizing research on consent to settle issues under California law (.5);	0.50	\$275.00
3/8/2024	Timothy Burns	Review PSZJ correspondence re case status update (.1);	0.10	\$112.00
3/9/2024	Jesse Bair	Review B. Cawley's email memo re summary of differences between the Debtor's and Committee's coverage charts (.1); review relevant historical insurance documents in connection with same (.1);	0.20	\$180.00
3/9/2024	Jesse Bair	Continue analyzing debtor coverage materials and draft overview of additional differences between the Debtor and Committee preliminary coverage chart (.3); correspond with B. Cawley re same and additional analysis needed (.2);	0.50	\$450.00
3/9/2024	Jesse Bair	Additional analysis and review of the Debtor's written responses and objections to the Committee's discovery requests (.1); correspond with B. Cawley re same and production status of the Debtor's coverage correspondence (.1);	0.20	\$180.00
3/10/2024	Timothy Burns	Review the Debtor's insurance discovery responses and internal emails with BB team regarding document review (.2);	0.20	\$224.00
3/11/2024	Timothy Burns	Review correspondence with PSZJ and J. Bair re insurance discovery issues (.2);	0.20	\$224.00

3/11/2024	Timothy Burns	Review correspondence from BB team re Debtor's insurance document production (.1);	0.10	\$112.00
3/11/2024	Timothy Burns	Review the Committee's draft discovery request letters and requests to the insurers (.3);	0.30	\$336.00
3/11/2024	Brian Cawley	Revise and edit insurance document requests and accompanying letters to implement suggested partner edits (1.7);	1.70	\$935.00
3/11/2024	Brian Cawley	Participate in conference with BB team re case status and ongoing insurance projects (.2);	0.20	\$110.00
3/11/2024	Brian Cawley	Supplemental analysis of Debtor historical insurance documents to address and reconcile additional discrepancies between debtor and Committee coverage charts (3.0);	3.00	\$1,650.00
3/11/2024	Brian Cawley	Draft revised summary explaining and reconciling discrepancies between debtor and committee coverage charts (.8);	0.80	\$440.00
3/11/2024	Brian Cawley	Analyze debtor coverage correspondence relevant to debtor/Committee coverage position review (1.3);	1.30	\$715.00
3/11/2024	Brian Cawley	Research procedural issues relating to insurance demands under California law (.7);	0.70	\$385.00
3/11/2024	Jesse Bair	Participate in conference with BB team re case status and ongoing insurance projects (.2);	0.20	\$180.00
3/11/2024	Jesse Bair	Review B. Michael's suggested revisions to the Committee's discovery requests on the insurers (.1);	0.10	\$90.00
3/12/2024	Brian Cawley	Correspond with A. Turgeon regarding documnt organization project (.4);	0.40	\$220.00
3/12/2024	Brian Cawley	Continue detailed research re insurance demand letters and parameters of insurers' duty to settle obligations in response to same under California law (1.3);	1.30	\$715.00
3/13/2024	Brian Cawley	Research and compile California cases involving effect of consent to settle and no-voluntary payments provisions and absence thereof (5.8);	5.80	\$3,190.00
3/13/2024	Jesse Bair	Review B. Michael's suggested edits to the Committee's insurance discovery requests (.1); correspond with B. Michael re same (.1);	0.20	\$180.00
3/14/2024	Brian Cawley	Continue researching consent to settle and no voluntary payment provision issues under California law (2.4); draft summary of research results for J. Bair (2.7);	5.10	\$2,805.00

3/15/2024	Jesse Bair	Participate in conference with B. Cawley re research needed re insurer duty to settle issues (.3);	0.30	\$270.00
3/15/2024	Brian Cawley	Begin detailed research of California case law re specific aspects of an insurer's duty to settle under particular factual scenarios (4.3);	4.30	\$2,365.00
3/18/2024	Brian Cawley	Continue detailed research of California case law re specific aspects of an insurer's duty to settle under particular factual scenarios (5.2);	5.20	\$2,860.00
3/18/2024	Alyssa Turgeon	Organize and index debtor historical insurance policy collection (4.9);	4.90	\$1,666.00
3/19/2024	Brian Cawley	Complete detailed research of California case law re specific aspects of an insurer's duty to settle under particular factual scenarios (2.5);	2.50	\$1,375.00
3/19/2024	Brian Cawley	Draft summary of research results re California duty to settle issues (2.3);	2.30	\$1,265.00
3/19/2024	Timothy Burns	Listen to SCOTUS oral argument re insurance neutrality issues (.1);	0.10	\$112.00
3/19/2024	Jesse Bair	Review B. Michael correspondence re discovery and mediation developments (.1);	0.10	\$90.00
3/21/2024	Timothy Burns	Participate in conference with T. Burns re case status and insurance strategy (.3);	0.30	\$336.00
3/21/2024	Jesse Bair	Review T. Burns email memo re outcome of state court counsel meeting (.1);	0.10	\$90.00
3/21/2024	Jesse Bair	Review revised version of the Committee's discovery requests to the insurers (.1); correspond with B. Cawley re additional edits needed to same (.1);	0.20	\$180.00
3/21/2024	Jesse Bair	Participate in conference with T. Burns re case status and insurance strategy (.3);	0.30	\$270.00
3/21/2024	Jesse Bair	Participate in conference with T. Burns re outcome of call with J. Stang re case developments and strategy (.1);	0.10	\$90.00
3/21/2024	Brian Cawley	Review summary of outcome of recent state court counsel meeting (.1);	0.10	\$55.00
3/22/2024	Brian Cawley	Revise and finalize the Committee's insurance document requests (1.9);	1.90	\$1,045.00
3/22/2024	Jesse Bair	Participate in call with G. Brown re interim fee application submissions, hearing, and case discovery status (.3);	0.30	\$270.00
3/22/2024	Jesse Bair	Revise, finalize, and serve discovery requests on each of the insurers (.6);	0.60	\$540.00
3/22/2024	Jesse Bair	Correspondence with the debtor and J. Stang re the Committee's insurance discovery requests (.1);	0.10	\$90.00

3/24/2024	Timothy Burns	Review final version of the Committee's insurance discovery requests to the carriers (.1); review multiple emails with J. Bair, PSZJ, and the debtor re same (.1);	0.20	\$224.00
3/25/2024	Timothy Burns	Met with internal team re case strategy, developments, and assignments (.1);	0.10	\$112.00
3/25/2024	Brian Cawley	Prepare for and participate in team meeting regarding case status and projects (.1);	0.10	\$55.00
3/25/2024	Jesse Bair	Participate in BB team meeting re case status and ongoing insurance projects (.1);	0.10	\$90.00
3/26/2024	Jesse Bair	Participate in conference with PSZJ and T. Burns re case developments, mediation, insurance strategy, and next steps (.5);	0.50	\$450.00
3/26/2024	Timothy Burns	Participate in conference with PSZJ and J. Bair re mediation strategy and next steps (.5);	0.50	\$560.00
3/27/2024	Timothy Burns	Review and respond to correspondence with state court counsel re insurance strategy (.2);	0.20	\$224.00
3/27/2024	Timothy Burns	Participate in call with certain state court counsel re insurance and mediation strategy (.2);	0.20	\$224.00
3/27/2024	Timothy Burns	Participate in conference with J. Bair re case strategy and related insurance projects (.2);	0.20	\$224.00
3/27/2024	Jesse Bair	Participate in conference with T. Burns re case status, strategy, and ongoing insurance projects (.2);	0.20	\$180.00
3/31/2024	Jesse Bair	Brief review re draft mediation motion for insurance purposes (.2);	0.20	\$180.00
3/31/2024	Jesse Bair	Review TNCRRG's response to the Committee's discovery requests (.2); review the TNCRRG policies in connection with same and potential scope of coverage (.4); draft reply to TNCRRG re same and requesting additional information (.1);	0.70	\$630.00
Totals for Insurance Recovery Activities			59.50	\$37,062.00

Total Hours and Fees	64.20	\$41,418.00
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EXPENSES

<u>Date</u>	<u>Description</u>	<u>Amount</u>
03/20/2024	Postage	\$0.92
Total Expenses		\$0.92

Timekeeper Summary

<u>Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Alyssa Turgeon	Paralegal	4.90	\$340.00	\$1,666.00
Brenda Horn-Edwards	Paralegal	0.60	\$340.00	\$204.00
Brian Cawley	Associate	40.80	\$550.00	\$22,440.00
Jesse Bair	Partner	8.70	\$900.00	\$7,830.00
Karin Jonch-Clausen	Associate	1.80	\$550.00	\$990.00
Timothy Burns	Partner	7.40	\$1,120.00	\$8,288.00

Total Due This Invoice: \$41,418.92